

**WONG, WONG & ASSOCIATES, P.C.**

RAYMOND H. WONG \*  
VALERIE Y. C. WONG \*

150 BROADWAY, SUITE 1588  
NEW YORK, NY 10038  
PHONE: (212) 566-8080  
FACSIMILE: (212) 566-8960

NEW JERSEY OFFICE  
12 ROSZEL RD, STE A102  
PRINCETON, NJ 08540  
PHONE: (609) 520-1668  
FACSIMILE: (609) 520-1168

PAUL ANDERSON GILMER \*  
NATALYA RUTCHYK \*  
DOUGLAS DOOLING, JR. °  
SURAJ SETHI \*

\* MEMBER NY & NJ BARS  
° MEMBER NY, NJ, MA & DC BARS

Hon. Diane Gujarati  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

July 8, 2022

*Gao v. Yu et al.*  
Civil Action No. 1:21-cv-06308-DG-MMH

Dear Hon. Diane Gujarati,

We write this letter to update you on the matter of Mediation and to resume litigation in this matter. Mediation took longer than expected, and unfortunately did not result in a settlement.

As a result, we now request that the court set up a schedule for the Motion to Dismiss. Because the Motion to Dismiss does not seek to dismiss all counts, especially breach of contract, we ask that we be permitted to hold a Rule 16 initial conference as soon as feasible.

Furthermore, given that we have already been provided sufficient documentation and given the pleadings, we plan to file a cross-motion seeking partial summary judgment on the issue of breach of contract. Please let us know when we should file our three-page brief as per your rules.

Respectfully Submitted,

By: /s/ Paul A. Gilmer

Paul A. Gilmer, Esq.

WONG, WONG, & ASSOCIATES, P.C.

*Attorney for Plaintiff*

150 Broadway, Suite 1588

New York, NY 10038

Tel.: (212) 566-8080

Fax: (212) 566-8960

[pgilmer@wongwonglaw.com](mailto:pgilmer@wongwonglaw.com)